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Savannah River Site

CITIZENS ADVISORY BOARD

A U.S. Department of Energy Site-Specific Advisory Board

May 26, 2004

Mr. Jeff Allison, Manager
U.S. Department of Energy
Savannah River Operations Office
Aiken, S.C. 29808

Dear Mr. Allison:

In light of recent guidance from DOE-Headquarters that EM Site Specific Advisory Boards must provide all advice via the Department, I am requesting your assistance in transmitting the attached letter regarding public comments on the Transuranic Waste Baseline Inventory Report Hearing to the Hearing Clerk for the New Mexico Environment Department.

Sincerely,

Jean M. Sulc
Jean Sulc
Chairman

cc: Jessie Roberson, DOE-HQ
Sandra Waisley, DOE-HQ
Fred Dowd, DOE-HQ
Charles Anderson, DOE-SR
Bill Spader, DOE-SR
Robert King, SCDHEC
J.I. Palmer, EPA-Region IV
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24 Harbor River Circle
St. Helena, S.C. 29920

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Myra Reace

Post-it® Fax Note	7671	Date	6/2/04	# of pages	3
To	Steve Zappe	From	Sally Warthington		
Co./Dept.	Haz Waste	Co.			
Phone #	428-2517	Phone #	827-2002		
Fax #	428-2567	Fax #	827-2836		

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Savannah River Site

CITIZENS ADVISORY BOARD

A U.S. Department of Energy Site-Specific Advisory Board

May 25, 2004

New Mexico Environment Department
 Ms. Geraldine Madrid-Chavez, Hearing Clerk
 Room N-4071, 1190 St. Francis Drive
 P. O. Box 26110
 Santa Fe, New Mexico 87505

Subject: Non-Technical Written Comments on TWBIR Public Hearing

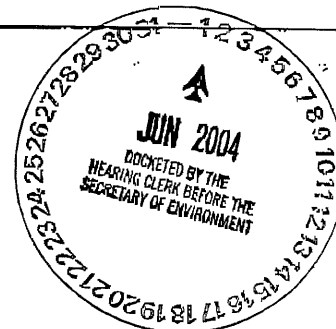
Dear Ms. Madrid-Chavez:

The Savannah River Site (SRS) Citizens Advisory Board (CAB) is a non-partisan group of individual stakeholders from South Carolina and Georgia. Chartered under the Federal Advisory Committee Act, the Board provides informed and timely recommendations on waste management, environmental restoration, and other activities affecting SRS.

The Waste Isolation Pilot Plant (WIPP) has been developed as the repository for all of the DOE Transuranic (TRU) waste including the SRS TRU waste. Therefore, actions at WIPP can affect TRU waste storage and shipments at SRS. As part of its review, the SRS CAB submitted a recommendation during the public notice period concerning New Mexico Environmental Department's (NMED) intent to approve an agency-initiated modification to the hazardous waste permit for WIPP. Part of this recommendation requested a public hearing on the proposed permit modification. At this time, the SRS CAB offers the following additional public comments to become part of the administrative record.

The SRS Citizens Advisory Board (CAB) does not agree with NMED's proposed modification. The SRS CAB finds it to be arbitrary, capricious and without technical merit. WIPP is the only deep geologic repository for disposal of TRU waste. The proposed modification did not indicate that the repository is near its capacity limit and did not address the cost and regulatory approval of a new repository to accept this additional waste. Again, we consider it arbitrary and capricious to discuss limiting receipt of TRU waste to that discussed in the original TWBIR. Because of current and planned DOE activity, SRS will generate additional TRU waste, whose future disposition is in doubt given NMED's proposal.

The original TWBIR projected an inventory at SRS of 9,648 cubic meters, however the current projected inventory is at 15,423 cubic meters. The 5,775 cubic meter difference between current and projected inventory is based on 1) recent receipt of 300 cubic meters of Mound (Ohio) TRU waste, 2) SRS generated TRU waste between 1995-2003, and 3) TRU waste that was originally planned to be vitrified to reduce its volume before disposal. This means that about 5,775 cubic meters that could meet the WIPP Waste Acceptance Criteria (WAC) would not be eligible for disposal at WIPP if the permit modification is approved. It is imperative for NMED, working with DOE, to develop a capability to certify waste not included in the original TWBIR.

**Chairperson**

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The SRS CAB believes that any TRU waste (mixed and non-mixed) that meets the WIPP WAC and any future-generated TRU waste from SRS should be accepted for disposal at WIPP. NMED should increase the SRS WIPP waste inventory level to include SRS' additional 5,775 cubic meters of mixed and non-mixed TRU waste.

The SRS CAB previously provided similar comments during the public comment period (see Recommendation #182 and comment letter from Chairman of the Facilities Disposition and Site Remediation Committee, H. Perry Holcomb, Ph.D.) and appreciates the opportunity to provide these additional comments for the public hearing record.

Sincerely,



Ms. Jean L. Sulc
CAB Chairperson